

OFFICE OF
GENERAL COUNSEL

Baboucar Taal

September 10, 2018

2018 SEP 17 AM 9:28

Bedford, NH03110

Office of General Counsel,
Federal Election Commission,
999 E Street, N.W.,
Washington, D.C. 20463.

MUR # 7500

Dear Committee Members:

Herein is a Complaint against a (state chartered) Credit Union: St Mary's Bank, it's top Management and Board of an ongoing Campaign Finance Violations within the FEC jurisdiction per Federal Election Campaign Act of 1971 as amended.

1. St Mary's Bank and it's management engaged illegal campaign contributions and in these specific cases grants prospective candidates for Public (state and federal) offices, a 20 or 30 yrs mortgage loan and then turn around and "discharge" said loan obligation within 21 to 31 days of taking out the fraudulent loan.

2. In many instance said scheme would take place 6 months to a year prior to the "candidate" registering to run for Public Office and in others during the campaign making it look like a "candidate" is injecting his/her own money into the campaign by taking out a "Mortgage" Not an Equity Line of Credit, and Not a Refinancing.

Mortgage! denoting said property was owned 'free and clear' even as the 'value' is Not there???

3. Again in instances of the later said scheme would then involve grant said fraudulent loan/mortgage with a quick "discharge" to reimburse, funnel/laundry money [evade taxes], back to the "prospective" candidate(s) who may have succeeded or and in a specific instance of who failed to win, a "mortgage" was granted on June 16 2016 for \$255,850.00 and "discharged" on July 5, 2016.

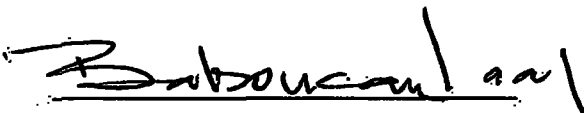
4. Said wanton Campaign finance Violation by St Mary's Bank has gone on as far back as the 1990s under the guidance of top management and board members.

1004447-40000

AFFIDAVIT

State of New Hampshire
County of Hillsborough

I, Baboucar Taal, hereby sworn to, and signed in the presence of a notary public, that the complaint is true to the best of my knowledge, executed by:

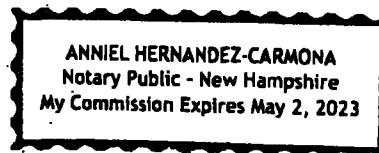


Baboucar Taal

Subscribed and sworn to, before me on this 10 day of ~~Sept~~ 2018



May 2, 2023



Notary Public

My Commission expires:



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 5, 2018

Baboucar Taal

Bedford, NH 03110

Dear Mr. Taal,

This is in response to your letter, which the Federal Election Commission (the "Commission") received on September 4, 2018.

The Federal Election Campaign Act of 1971, as amended (the "Act"), and Commission regulations require that a complaint meet certain requirements. Your letter does not appear to meet these requirements. Specifically, your letter did not include a clear and concise recitation of facts describing violations of the Act over which the Commission has jurisdiction. Consequently, the Commission can take no action at this time unless the allegations are refiled meeting the requirements for a properly filed complaint.

If you desire the Commission to look into the matters discussed in your letter to determine if the Act has been violated, a formal complaint as described in 52 U.S.C. § 30109(a)(1) must be filed. Requirements of this section of the law, and Commission regulations at 11 C.F.R. § 111.4, which are a prerequisite to Commission action, are detailed below:

- (1) A formal complaint should contain a clear and concise recitation of the facts describing the violation of a statute or law over which the Commission has jurisdiction (11 C.F.R. § 111.4).
- (2) Its contents must be sworn to and signed in the presence of a notary public and shall be notarized. (52 U.S.C. § 30109(a)(1)). The notary must indicate as part of the jurat that such swearing occurred. It is not sufficient for the notary to "acknowledge" the identity of the individual before him or her. The preferred form is "Subscribed and sworn to before me on this ____ day of ____, ____".
- (3) A formal complaint should be accompanied by supporting documentation if known and available to the person making the complaint. (11 C.F.R. § 111.4).
- (4) A complaint must be in writing. (52 U.S.C. § 30109(a)(1)).

- (5) A formal complaint must contain the full name and address of the person making the complaint. (11 C.F.R. § 111.4).
- (6) A formal complaint should clearly identify as a respondent each person or entity who is alleged to have committed a violation. (11 C.F.R. § 111.4).
- (7) A formal complaint should identify the source of information upon which the complaint is based. (11 C.F.R. § 111.4).

Please note that this matter will remain confidential for a 15 day period to allow you to correct the defects in your complaint. If the complaint is corrected and refiled within the 15 day period, the respondents will be so informed and provided a copy of the corrected complaint. The respondents will then have an additional 15 days to respond to the complaint on the merits. If the complaint is not corrected, the file will be closed and no additional notification will be provided to the respondents.

For further information on filing a complaint, please visit our website at <https://www.fec.gov/legal-resources/enforcement/complaints-process/>. If I can be of additional assistance, please contact me at 202-694-1650.

Sincerely,



Kristina Portner
Complaints Examination
& Legal Administration

1007474-1

OFFICE OF GENERAL COUNSEL
OFFICE OF GENERAL COUNSEL

Baboucar Taal

August 27, 2018

2018 AUG 35 AM 10: 40

Bedford, NH03110

Office of General Counsel,
Federal Election Commission,
999 E Street, N.W.,
Washington, D.C. 20463.

OFFICE OF
GENERAL COUNSEL

2018 SEP -4 AM 10: 46

Dear Committee Members:

1. Herein is a Complaint against a (state chartered) Credit Union: St Mary's Bank "SMB" and it's [Ongoing*] Co-Conspirators who have engaged in bank fraud to cover up money laundering to cover up Tax Evasion to selected few "in the know" to cover up fund/violate Federal Campaign Finance laws all in furtherance of scheme to Defraud the United States of America. ***652. Statute of Limitations for Conspiracy:** Conspiracy is a continuing offense. For statutes such as 18 U.S.C. § 371, which require an overt act in furtherance of the conspiracy, the statute of limitations begins to run on the date of the last overt act. *See Fiswick v. United States*, 329 U.S. 211 (1946); *United States v. Butler*, 792 F.2d 1528 (11th Cir. 1986). For conspiracy statutes which do not require proof of an overt act, such as RICO (18 U.S.C. § 1961) or 21 U.S.C. § 846, the government must allege and prove that the conspiracy continued into the limitations period. The crucial question in this regard is the scope of the conspiratorial agreement, and the conspiracy is deemed to continue until its purpose has been achieved or abandoned. *See United States v. Northern Imp. Co.*, 814 F.2d 540 (8th Cir. 1987); *United States v. Coia*, 719 F.2d 1120 (11th Cir. 1983), *cert. denied*, 466 U.S. 973 (1984).

2. Said scheme and artifice to defraud is complex yet simple and in plain sight: Take one example of the former CEO of the bank, an Ovide M. Lamontagne who sought public office (both state and federal) who worked for a state governor name Steve Merrill along with a Gillian Abramson (state judge), J LaPlante, J Howard (federal district and circuit judges) and Lamontagne just happen to buy a significant partnership in the very firm that LaPlante pick NH District magistrate judge Jonestone (who left with a separation package).

3. The scheme: St Mary's management would grant a 30 years mortgage loan, and we will stay with Lamontagne; on a property but discharge this said mortgage obligation with 21 days free and clear, and some instances allow said person to

Political career [edit]

In 1993, Lamontagne was appointed the chair of the New Hampshire State Board of Education by Governor Steve Merrill, serving in that post until 1996, when he resigned to run for governor.

1996 gubernatorial campaign [edit]

In 1996, when Merrill declined to run for reelection, Lamontagne won the Republican nomination for governor. He faced off against New Hampshire state senator Jeanne Shaheen, a political moderate, who had won the Democraticod. Running as a social conservative, Lamontagne was decisively defeated by Shaheen, losing by a margin of 40 percent to 57 percent.^[9]

2010 Senate campaign [edit]

See also: United States Senate election in New Hampshire, 2010

When incumbent Republican U.S. Senator Judd Gregg decided to retire instead of seeking re-election, Lamontagne ran for the Republican nomination to the U.S. Senate. His main opponent in the primary was New Hampshire Attorney General Kelly Ayotte, who had resigned on July 7, 2009, to launch her campaign.^{[10][11][12]} Ayotte had been recruited by the Republican Party's National Republican Senatorial Committee to enter the race, and she was supported by such GOP heavyweights as 2008 Republican Presidential nominee John McCain, who campaigned for her in New Hampshire.^[13]

In addition to Ayotte, who was considered the front-runner, the other candidates for the Republican nomination were millionaire businessman Bill Blinnie and Jim Bender. Drawing on support from the Tea Party movement,^[14] Lamontagne made a very strong showing against Ayotte, despite being outspent by Ayotte by a factor of five (\$2 million to \$400,000).^[15] The race was considered too close to call by the major media until the morning of the day after Election Day.^[15] When Ayotte eventually pulled ahead by approximately 1,600 votes in a contest Norma Love of *Huffington Post* called a "nail biter", Lamontagne conceded the election.^[16]

After being defeated by Ayotte, Lamontagne raised money for her campaign.^{[17][18][19]}

2012 gubernatorial campaign [edit]

See also: New Hampshire gubernatorial election, 2012

On September 19, 2011, Lamontagne announced his candidacy for the 2012 Republican gubernatorial nomination at the Bedford Republican Breakfast at the Manchester Country Club, becoming the first candidate to throw his or her hat into the ring.^[20] On March 13, 2012, Lamontagne was endorsed by incumbent Congressman Charles Bass of the New Hampshire Second Congressional District. Lamontagne in turn endorsed Bass for reelection.^[21] Lamontagne's gubernatorial bid was endorsed by Judd Gregg^[22] on May 3, 2012. On September 11, 2012, Lamontagne won the Republican nomination for Governor. He lost by a margin of 55–43.

taken out another loan with another financial institution and close on it at the same day. In other instances, write a fictitious address by adding a letter on the correct address and or misrepresent/mislead the Federally Required Recording of said transaction with the State's Registry of Deeds. See nhdeeds.com, Hillsborough County: Search: Grantor: 1966...

4. This scheme has gone on as far back as the 1990's and in the case of this current/former bank executive (subject of an SEC investigation); Lamontagne his first run for governor of the state 1996. Within 6-9 months of this bank fraud the co-conspirator would throw his/her hand in the ring for "public Office" and FEC own documents records significant contribution by "the candidate", proceeds of fraudulent origin, thus the tolling and as the last fraudulent [mortgage fraud to cover up...] occurred in 2016. This was # 1:

1. On June 16 2016, Ovide M Lamontagne and Elizabeth E Lamontagne (husband & wife) took out and received a 30 year mortgage from St Mary's Bank "SMB" [a state chartered credit union] for \$255,850.00 for property (a townhouse) located at 125 Riverwalk Way Manchester, NH 03101

5. As it so happens a complaint was before this very Commission of a questionable \$\$\$ that a certain [NH] US Congressman couldn't satisfactorily explain as the same St Mary's bank granted a "mortgage" obligation of identical amount, how coincidental? Said Bank frauds has been used to fund state offices and federal US Congressional campaigns all the while with one constant and under the tutelage of a Ronald Rioux, Ovide Lamontagne, Ronald Covey and all the Board Members.

These facts are in a letter to the IRS Tax Exempt Division, the Bureau under SAC Shaw and SEC.

An update/follow up:

Baboucar Taal <

To: Jennifer M. Brady

Cc: levensonp@sec.gov



St. Mary's Bank

for members only

spring 2010

» Outgoing Message to Members

Ovide M. Lamontagne, Chairman

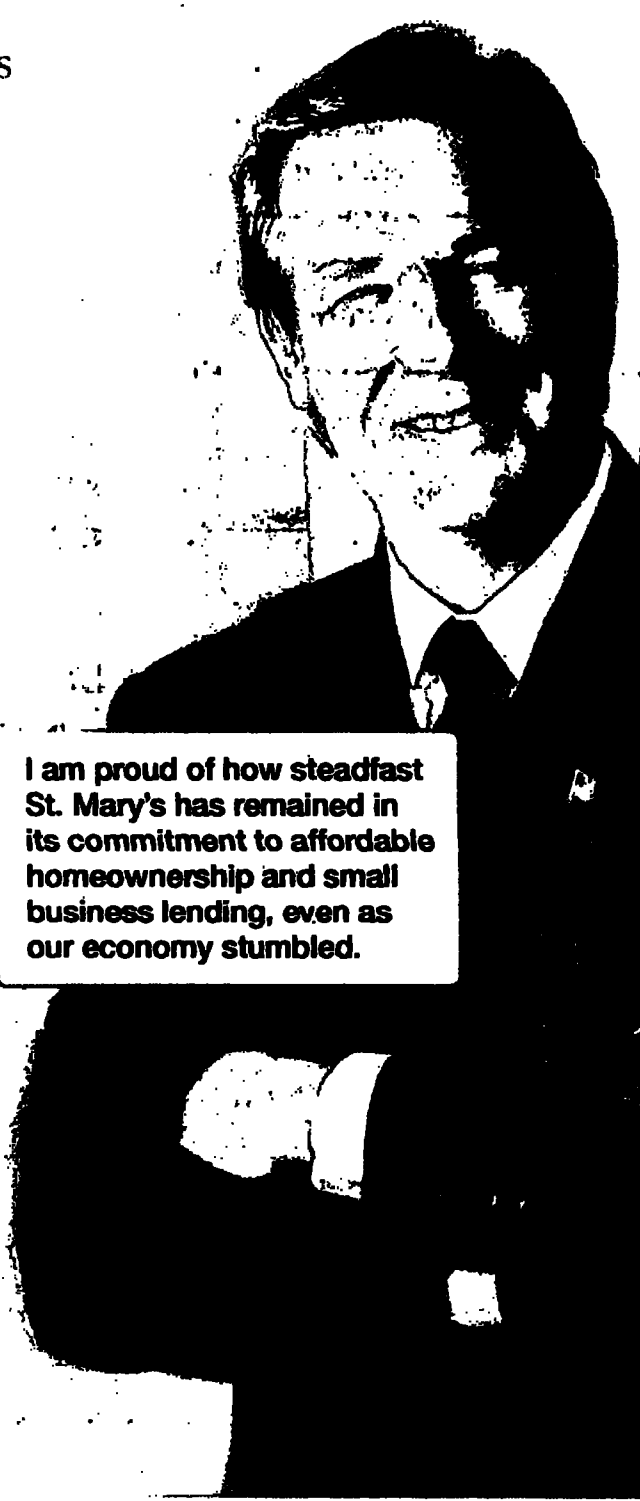
I have had the privilege of serving the members and employees of St. Mary's Bank for nine rewarding years as a member of the Board of Directors. The past nine years have brought many challenges and rewards, introduced me to new friends and strengthened my ties with the community. It is, therefore, not without regret that I share with you my decision to complete my current term and step down from the Board and as Chairman at the annual shareholders' meeting this April.

It has been an honor to be part of the Board of Directors of St. Mary's Bank during a decade of growth and celebration. Since I joined the Board in 2000, I have had the pleasure of working with both Ronald Rioux and Ronald Covey, two outstanding CEOs. I have seen us add four retail branches, increase our assets to an impressive \$700 million, and help hundreds of families through our community outreach programs. I am proud of how steadfast St. Mary's has remained in its commitment to affordable homeownership and small business lending, even as our economy stumbled. And nothing could compare with celebrating the 100th anniversary of the Nation's First Credit Union, an organization that also holds such personal and historical significance for me. It has truly been an extraordinary experience to help lead St. Mary's into a new century of service.

I will always treasure my time at St. Mary's Bank. I have learned much about our financial system and the critical role credit unions play in meeting the financial needs of their members. I commend our senior management team and our employees for their integrity, compassion and vigilance in bringing to life the credit union's original mission of "people helping people." I am grateful to them for serving with such passion and selflessness. Above all, I thank our members for choosing us to meet their financial needs.

My family has a long history with St. Mary's Bank. My father is a past Chairman of the Board, and my uncles served as Board members and legal counsel to "La Caisse Populaire Ste. Marie." My leaving the Board in no way severs our ties. I will continue to follow St. Mary's future successes from the sidelines as a member. Knowing this great credit union as I do, I am confident that its next chairman will bring his or her own strengths to bear, with exceptional results.

Every day, the people of St. Mary's inspire me to give my all. As I undertake a new endeavor in my life, and campaign for U.S. Senator in New Hampshire, I will remember and treasure the countless lessons my experience on the Board have taught me. Thank you for giving me the opportunity to serve.



I am proud of how steadfast St. Mary's has remained in its commitment to affordable homeownership and small business lending, even as our economy stumbled.

Sent: Tuesday, August 14, 2018, 3:08:21 PM EDT
Subject: Re: Pic a 1000 words?

In a letter address to the IRS Tax Exempt Division copied to the SEC dated on or around Oct 17, 2016, this was #7:

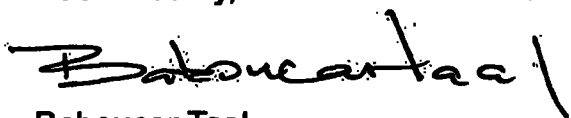
[Said (Lamontagne) person with the mortgage fraud scheme detailed in that letter have convince the board of that condominium to erect a gate to in essence, what prevent the fbi (assuming it has not already) or an investigative authority (IRS-CI or SEC) to verify that there is No 125 Riverwalk Way unit 4B.]

As also detailed in a prior information copied to the bureau as well, I indicated that upon contacts with a local reporter with NHPR (WEVO) Emily Corwin, she and her editors used the confidential information provided about St Mary's Bank, its management and ex Chairman Ovide Lamontagne, they leveraged this to a program sponsorship from St Mary's bank and law offices of Bernstein Shur, where Lamontagne is a Senior partner. Inquiry into how this could happen, I was threatened by a female editor when I tried to reach the director Betsy Gardelli's office. Ms Corwin moved/was moved to VTPR.

Now we are being again threaten by "federal court officer" I understand knew of and/or are aware of these mortgage/loan fraudulent schemes to cover up money laundering to cover up tax evasion and campaign finance fraud, what USDOJ called: *Mail and Wire Fraud*. Now involves Obstruction of Justice by federal court officers for their violations of 18 §4 and 18 §1512.

Isn't all or some of the actions by St Mary's, it's management and connected co-conspirators constitute what is Legally call: **Consciousness of Guilt** which: "Evidentiary rules allow a prosecutor to introduce testimony that tends to show that the defendants actions prove he knew he was guilty (at least of something). This is sometimes referred to as "consciousness of guilt"

Submitted by, _____



Baboucar Taal

Cc:

1004447410017

Their legacy includes positioning the credit union for the future through board decisions to invest in new facilities and advanced technology.

"I owe a debt of gratitude to Sue and Ron for their support, counsel, and confidence over the years," added Covey. "They will be missed, and I hope they'll continue their close relationships with St. Mary's Bank. I wish them all the best." Vachon joined the board in 1997 and served on the Credit Committee from 2003 to 2010 and again from 2014 to present. Rioux began his service as President/CEO in 1993. Following his retirement from that role, he joined the board in 2009 and has served on the Credit Committee since 2011.

In other business, St. Mary's Bank members elected veteran board member Joseph Fremeau and new board member Diane Fitzpatrick, Chief Executive Officer of the Boys & Girls Club of Manchester, to a three-year term on the board of directors. Guy Chapdelaine, CPA; Craig Donais, Esq.; and Kara Fontaine, CPA were elected to a one-year term on the Supervisory Committee. Joseph Fremeau, Stephen Grzywacz, Elizabeth Hitchcock, and were elected to a one-year term on the Credit Committee.

Following the annual meeting, the board re-elected Daniel Healy as Chairman of the Board of Directors. He is the owner-president and funeral director of the Connor-Healy Funeral Home and Cremation Center in Manchester. Guy Chapdelaine, CPA was re-elected Vice Chairman of the Board. Chapdelaine formerly served as the Finance Officer for the Diocese of Manchester.

Resources

Board of Directors - Meet the Board of Directors at St. Mary's Bank:



From Left to Right: David H. Bellman; Elizabeth S. C. Hitchcock; Joseph G. Fremeau; Stephen J. Grzywacz; Ronald H. Covey, Jr., CEO; Daniel J. Healy, Chairman; Gina M. Balkus; Diane P. Fitzpatrick; and Guy D. Chapdelaine, Vice Chairman

Within is the "gated" and not only the vehicle entrance but even the walk around is now fenced, suppose to prevent Law Enforcement to ever verify that there is: **No 125 Riverwalk Way unit 4B** address Ovide Lamontagne, Ronald Covey et al used to defraud St Mary's Bank (Credit Union).



St. Mary's Bank Holds 109th Annual Shareholder Meeting and Honors Retiring Board Members Vachon and Rioux

Posted On 4/18/2018

St. Mary's Bank, the nation's first credit union, held its 109th Annual Shareholder meeting April 11, 2018 at its McGregor Street headquarters in Manchester.

President/CEO Ron Covey reviewed the credit union's financial success over the past year, which included

- \$444 million in total loan production
- \$444 million in total loan production
- \$857 million in total deposits
- \$857 million in total deposits
- \$989 million in assets
- \$4.2 million in net income, up almost 15 percent from 2016.

After the financial report, Chairman of the Board Daniel Healy recognized board members Suzanne Vachon and Ronald Rioux, who retired from the board at the conclusion of the meeting.



Photo caption: From left: Ronald Rioux, Suzanne Vachon, and Daniel Healy

"Tonight, we turn a page in the St. Mary's Bank history book," remarked Healy. "We celebrate the service of Sue and Ron, two very dedicated board members and stewards of our historic institution, and it is my honor to recognize and thank them for their remarkable service to our credit union." During their time on the board, Healy shared, Vachon and Rioux dedicated themselves to upholding St. Mary's Bank's mission and donating their time to their community.

AFFIDAVIT of Complaint

State of New Hampshire
County of Hillsborough

I, Baboucar Taal, hereby sworn to, and notarized, that the complaint is true to the best of my knowledge and RTB and is executed by:

Baboucar Taal

Baboucar Taal

Dated August 27, 2018

The complainant affirmed the complaint under penalty of perjury.

BABOUCAR TAAL

signed and sworn to before me

Debra J. Shaughnessy 8-27-2018

Notary Public

My Commission expires:

DEBRA J. SHAUGHNESSY
Notary Public - New Hampshire
My Commission Expires Aug 24, 2021

[Open original image](#)

Contributor information

Name	LAMONTAGNE, OVIDE M ESQ
City and state	MANCHESTER, NH, 03103
Year to date	\$61,564.34

Contribution information

Amount	\$39,000.00
Receipt date	September 6, 2010
Memo	
Reported on	Form 3 on line 13A
Election type	PRIMARY

Recipient information

Committee	<u>OVIDE FOR SENATE 2010</u>
Political party	REPUBLICAN PARTY
Type	Senate
State	New Hampshire

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:		PAGE 53 / 92	
(check only one)			
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
<input type="checkbox"/> 12	<input checked="" type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14 <input type="checkbox"/> 15

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Ovada For Senate 2010

A.

Full Name (Last, First, Middle Initial)

Ovada M. Lamontagne, Esq.

Mailing Address 172 Young Street

City

Manchester

State

NH

Zip Code

03103-3758

FEC ID number of contributing
federal political committee.

C

Name of Employer
Devine Millimet & Branch

Occupation

Attorney

Receipt For: 2010

☒ Primary ☐ General

Other (specify) ▼

Election Cycle-to-Date ▼

61584.34

Date of Receipt

09 06 2010

Transaction ID: A-L2

Amount of Each Receipt This Period

39000.00

B.

Full Name (Last, First, Middle Initial)

Ovada M. Lamontagne, Esq.

Mailing Address 172 Young Street

City

Manchester

State

NH

Zip Code

03103-3758

FEC ID number of contributing
federal political committee.

C

Name of Employer
Devine Millimet & Branch

Occupation

Attorney

Receipt For: 2010

☒ Primary ☐ General

Other (specify) ▼

Election Cycle-to-Date ▼

61584.34

Date of Receipt

09 07 2010

Transaction ID: A-L3

Amount of Each Receipt This Period

6000.00

SUBTOTAL of Receipts This Page (optional)

45000.00

TOTAL This Period (last page this line number only)

45000.00

10020823580

10020823580

EDoc # 8027373 Jun 21, 2016 10:47 AM

Book 8867 Page 1484 Page 1 of 18

Register of Deeds, Hillsborough County

Carmela O. Coughlin

After Recording Return To:

ST. MARY'S BANK

ATTN: MATTHEW TRAINOR 48 PERIMETER RD

MANCHESTER, NEW HAMPSHIRE 03103

Loan Number: 100276690

(Space Above This Line For Recording Date)

MORTGAGE

DEFINITIONS

Words used in multiple sections of this document are defined below and other words are defined in Sections 3, 11, 13, 18, 20 and 21. Certain rules regarding the usage of words used in this document are also provided in Section 16.

(A) "Security Instrument" means this document, which is dated JUNE 16, 2016, together with all Riders to this document.

(B) "Borrower" is OVIDE M LAMONTAGNE and ELIZABETH E LAMONTAGNE husband and wife

Borrower is the mortgagor under this Security Instrument.

(C) "Lender" is ST. MARY'S BANK

Lender is a STATE CHARTERED CREDIT UNION organized and existing under the laws of NEW HAMPSHIRE
Lender's address is 48 PERIMETER RD, MANCHESTER, NEW HAMPSHIRE 03103

Lender is the mortgagee under this Security Instrument.

(D) "Note" means the promissory note signed by Borrower and dated JUNE 16, 2016
The Note states that Borrower owes Lender TWO HUNDRED FIFTY-FIVE THOUSAND EIGHT HUNDRED FIFTY AND 00/100 Dollars (U.S. \$ 255,850.00)
plus interest. Borrower has promised to pay this debt in regular Periodic Payments and to pay the debt in full not later than JULY 1, 2046

(E) "Property" means the property that is described below under the heading "Transfer of Rights in the Property."

(F) "Loan" means the debt evidenced by the Note, plus interest, any prepayment charges and late charges due under the Note, and all sums due under this Security Instrument, plus interest.

Carmela D. Coughlin



Return To: *env*

OVIDE MARC LAMONTAGNE
125 RIVERWALK WAY
MANCHESTER NH 03101

MORTGAGE DISCHARGE

FOR VALUE RECEIVED, ST. MARY'S BANK, HOLDER OF A MORTGAGE
FROM OVIDE M LAMONTAGNE AND ELIZABETH E LAMONTAGNE,
DATED AUGUST 23, 2013, AND RECORDED IN THE HILLSBOROUGH
COUNTY REGISTRY OF DEEDS AT BOOK 8397 PAGE 0641 HEREBY
DISCHARGE SAID MORTGAGE.

WITNESS MY HAND THIS 5TH DAY OF JULY 2016.

ST. MARY'S BANK

Jerrilyn Tancrell
JERRILYNN TANCRELL
LOAN SERVICING
SPECIALIST III

Charles Jennings
CHARLES JENNINGS
ITS: LOAN SERVICING MANAGER
DULY AUTHORIZED
ST. MARY'S BANK

PROPERTY: 125 RIVERWALK WAY #4B, MANCHESTER, NH 03101

1606147442091